

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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LUISA CALIXTO,

Case No.: 1:18-cv-04675

Plaintiff,

-against-

BALSAMO & ROSENBLATT, P.C.,
ROBERT ROSENBLATT, EDWARD HALL,
SERENAY TAYSIN, 266 REALTY NY LLC,
HEUNG SANG TAM, and JUSTICE MCALLISTER

Defendant.

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STIPULATION AS TO ENTITIES A. BALSAMO & ROSENBLATT, P.C. AND
BALSAMO & ROSENBLATT, P.C.

1. This stipulation is made between Defendants Balsamo & Rosenblatt, P.C., Robert Rosenblatt, Edward Hall, and Serenay Taysin (collectively the “Attorney Defendants”) and Plaintiff Luisa Calixto to clarify the entities at issue in this action.
2. Attorney Defendants stipulate, for the purpose of this action, that A. Balsamo & Rosenblatt, P.C. and Balsamo & Rosenblatt, P.C. are legal entities referring to the same law firm.
3. Attorney Defendants stipulate, for the purpose of this action, that the firm appearing as Balsamo & Rosenblatt, P.C. in *266 Realty NY LLC v. Luisa Calixto*, Index Number 84971/17 (the “LT Action”) was, in fact, A. Balsamo & Rosenblatt, P.C.
4. Attorney Defendants stipulate that there were no other entities, formal or informal, besides A. Balsamo & Rosenblatt, P.C. and Balsamo & Rosenblatt, P.C. that filed the lawsuit in the LT Action.
5. Attorney Defendants consent to Plaintiff amending the Complaint [DE 1] to add A. Balsamo

& Rosenblatt, P.C. as a Defendant, *nunc pro tunc*. The Attorney Defendants and A. Balsamo & Rosenblatt, P.C. stipulate that the adding of A. Balsamo & Rosenblatt, P.C. relates back to the filing of the Original Complaint, and thus that they waive any argument as to statute of limitations or laches based on A. Balsamo & Rosenblatt, P.C. being added as a party after the date of the filing of the Original Complaint.

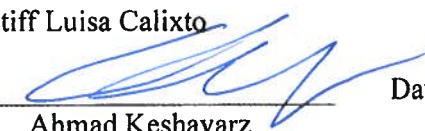
AGREED:

Attorney Defendants (Balsamo & Rosenblatt, P.C., Robert Rosenblatt, Edward Hall, Serenay Taysin)

By:  Date: 4/26/19
Ken Novikoff
Rivkin Radler LLP

AGREED:

Plaintiff Luisa Calixto

By:  Date: 4/29/2019
Ahmad Keshavarz
The Law Office of Ahmad Keshavarz
One of Plaintiff's Attorneys

SO ORDERED this _____ day of _____, 2019.

Magistrate Judge Steven M. Gold